

1 Michael L. Mallow (State Bar No. 188745)
mmallow@loeb.com
2 Christine M. Reilly (State Bar No. 226388)
creilly@loeb.com
3 Meredith J. Siller (State Bar No. 278293)
msiller@loeb.com
4 LOEB & LOEB LLP
10100 Santa Monica Boulevard, Suite 2200
5 Los Angeles, California 90067-4120
Telephone: (310) 282-2000
6 Facsimile: (310) 282-2200

7 Attorneys for Defendant
Mountain West Research Center, L.C.
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12 Paul Mankin, individually and on behalf
13 of all others similarly situated,

14 Plaintiff,

15 v.

16 Mountain West Research Center, L.C.,
and does 1 through 10, inclusive, and
17 each of them,

18 Defendants.
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Case No. CV13-06447-DSF (AGRx)

Assigned to Hon. Dale S. Fischer

**STIPULATION EXTENDING DATE
BY WHICH DEFENDANT MUST
RESPOND TO COMPLAINT,
MODIFYING BRIEFING
SCHEDULE, AND SETTING DATE
BY WHICH THE PARTIES' RULE
26(f) CONFERENCE MUST OCCUR**

Action Filed on September 3, 2013

Service Waived on September 12, 2013

Filed and Served with [Proposed] Order

STIPULATION

WHEREAS, plaintiff Paul Mankin (“Plaintiff”) and defendant Mountain West Research Center, L.C. (“Defendant”), by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, on September 3, 2013, Plaintiff filed a complaint asserting class action allegations for damages and injunctive relief pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq. (the “Complaint”) in the United States District Court, Central District of California;

WHEREAS, on September 12, 2013, Defendant signed a Waiver of the Service of Summons, which was filed on September 17, 2013;

WHEREAS, Defendant’s Response to the Complaint is currently due on November 12, 2013;

WHEREAS, the parties agree to extend the date by which Defendant must respond to the Complaint until Friday, January 3, 2014, due to the impending holidays;

WHEREAS, the parties agree to extend the date by which Plaintiff must file any Opposition, if necessary, to Defendant’s Response to Friday, January 24, 2014;

WHEREAS, the parties agree to extend the date by which Defendant must file any Reply, if necessary, in support of Defendant’s Response to Friday, February 7, 2014;

WHEREAS, the parties agree to conduct their Rule 26(f) conference by Friday, December 20, 2013, unless the Court sets the Scheduling Conference at an earlier date;

WHEREAS, there have been no prior requests for extensions of these deadlines; and

WHEREAS, this stipulation is made without prejudice to any party’s right to request, subject to Court approval, further extensions of this deadline, as appropriate.

1 **THEREFORE**, the parties stipulate, subject to court approval, that
2 Defendant's deadline to respond to the Complaint should be continued until Friday,
3 January 3, 2014; that Plaintiff's deadline to file an Opposition, if the Defendant does
4 not Answer, is Friday, January 24, 2014; that Defendant's deadline to file a Reply, if
5 the Defendant does not Answer, is Friday, February 7, 2014; and the parties agree to
6 conduct their Rule 26(f) conference by Friday, December 20, 2013.

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8 Dated: November 6, 2013

LOEB & LOEB LLP
MICHAEL L. MALLOW
CHRISTINE M. REILLY
MEREDITH J. SILLER

11 By /s/ Meredith J. Siller
12 Meredith J. Siller
13 Attorneys for Defendant
14 Mountain West Research Center, L.C.

15 KRISTENSEN WEISBERG, LLP
16 JOHN P. KRISTENSEN
17 DAVID L. WEISBERG

18 By /s/ John Kristensen
19 John Kristensen
20 Attorneys for Plaintiff
21 Paul Mankin
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